

[COUNSEL OF RECORD LISTED ON  
SIGNATURE PAGE]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

TESSERA, INC.,

Plaintiff,

v.

ADVANCED MICRO DEVICES, INC., a  
Delaware corporation, SPANSION INC., a  
Delaware corporation, SPANSION  
TECHNOLOGY INC., a Delaware  
corporation, SPANSION LLC, a  
Delaware limited liability corporation,  
ADVANCED SEMICONDUCTOR  
ENGINEERING, INC., a Republic of China  
corporation, ASE (U.S.) INC., a California  
corporation, CHIPMOS TECHNOLOGIES  
INC., a Republic of China corporation,  
CHIPMOS U.S.A., INC., a California  
corporation, SILICONWARE PRECISION  
INDUSTRIES CO., LTD., a Republic of  
China corporation, SILICONWARE USA  
INC., a California corporation,  
STMICROELECTRONICS N.V., a  
Netherlands corporation,  
STMICROELECTRONICS, INC., a Delaware  
corporation, STATS CHIPPAC LTD., a  
Singapore company, STATS CHIPPAC, INC.,  
a Delaware corporation, and STATS CHIPPAC  
(BVI) LIMITED, a British Virgin Islands  
company,

Defendants,

AND RELATED COUNTERCLAIMS.

**CASE NO. C 05-04063 CW (EDL)**

**~~PROPOSED~~ STIPULATED  
PROTECTIVE ORDER**

Defendants STATS ChipPAC Ltd, STATS ChipPAC, Inc., and STATS ChipPAC  
(BVI) Limited (collectively “STATS ChipPAC”) have identified certain responsive documents in  
their possession, custody, or control that contain the confidential information of Samsung  
Electronics, Co., Ltd, and Samsung Electro-Mechanics (collectively “Samsung”), a non-party to

**~~PROPOSED~~ STIPULATED PROTECTIVE ORDER**

**Case No. C 05-04063 CW (EDL)**

this action. Samsung and the Parties to this Action agree that Samsung may designate these documents "Outside Counsel Eyes Only." Documents designated "Outside Counsel Eyes Only" may only be disclosed to Outside Counsel (Section 2.10), Experts (Section 2.12), Professional Vendors (Section 2.13), and Graphics/Trial Consultants (Section 2.14), but not to House Counsel (Section 2.11), as those terms are defined in the June 30, 2006 Stipulated Interim Protective Order. Other than this additional Stipulation, the June 30, 2006 Stipulated Interim Protective Order (and all amendments thereto) shall remain in full force and effect.

DATED: October 11, 2006

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DATED: October 11, 2006

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 TECHNOLOGY, INC.; and  
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15 DATED: October 11, 2006

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CHIPPAC (BVI) LIMITED

Pursuant to the stipulation, it is so ordered.

Dated: October 11, 2006

